

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

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U.S. DISTRICT COURT
SAN JUAN, P.R.

IN RE:

RIO PIEDRAS EXPLOSION LITIGATION

CONSOLIDATED CIVIL
ACTIONS NO. 96-2443 (CCC)

**This pleading relates only to
Action No. 97-2769**

**MOTION FOR LEAVE TO SUBMIT
SETTLEMENT PROPOSAL UNDER SEAL**

TO THE HONORABLE COURT:

The Plaintiffs' Steering Committee ("PSC"), through the undersigned attorney, respectfully informs and prays as follows:

1. On August 4, 2004, a Status Conference was held before Magistrate Judge Aida Delgado to discuss several outstanding issues to close the consolidated cases.
2. On August 10, 2004, the Court issued a Conference Report and Order instructing the members of the PSC to expedite resolution of the dispute pertaining to payment of the PSC attorneys' fees as it pertains to the dissolution proceedings of El Fénix de Puerto Rico, currently under the consideration of the Bankruptcy Court.
3. In compliance with the Magistrate's Order, the PSC members have accepted the terms of the settlement proposal and wish to submit this document under seal.

4. The PSC hereby requests leave to file under seal the settlement proposal reached.

WHEREFORE, the appearing party respectfully requests leave to file the Settlement Agreement reached pertaining to Civil No. 97-2769.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 27th day of August, 2004.

I HEREBY CERTIFY: that a true and exact copy of the foregoing Motion has been sent, by regular mail, to: Juan A. Moldes, Esq., Home Mortgage Plaza, Suite 440, 268 Ponce de León Ave., Hato Rey, PR 00918.

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